

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

| | | |
|---------------------------|---|------------------------|
| NICOLE JENNINGS WADE, |) | |
| JONATHAN D. GRUNBERG, and |) | |
| G. TAYLOR WILSON |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION |
| v. |) | |
| |) | |
| L. LIN WOOD, |) | FILE NO. 1:22-CV-01073 |
| |) | |
| Defendant. |) | |
| _____ |) | |

DEFENDANT’S MOTION FOR DISQUALIFICATION

COMES NOW, L. LIN WOOD, Defendant to the above-styled civil action, and hereby files this his Motion for Disqualification, and respectfully shows this Honorable Court as follows:

Defendant Wood hereby respectfully contends that Judge Michael L. Brown must be disqualified from presiding over the present civil action because of prior and current professional associations with two material witnesses. Defendant Wood hereby shows, pursuant to 28 U.S.C. § 455(b)(2), (b)(4), and (b)(5)(iii), that Judge Brown’s prior and current professional associations with the two material witnesses present a reasonable risk that the Court’s impartiality might be questioned. *See* 28 U.S.C. § 455(a). Defendant further submits, pursuant to 28 U.S.C. § 144, that a personal bias or prejudice against him exists in the present case.

In Support of this Motion, Defendant Wood respectfully submits his accompanying Memorandum of Law in Support of Motion for Disqualification, as well as the attached affidavit labeled as “**Exhibit A.**”

WHEREFORE, Defendant Wood hereby respectfully requests that this Honorable Court disqualify itself from presiding over the present case.

This 11th day of July, 2024.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199
JACKSON A. GRINER
Georgia State Bar No. 495020
harrison@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
T: 770-422-3233
F: 770-423-4199

JOHN EXUM LAW, LLC

By: /s/ John P. Exum, Jr.
JOHN P. EXUM, JR.
Georgia State Bar No. 568819
jexum@johnexum.com
Attorneys for Defendant

John Exum Law, LLC
2625 Piedmont Road NE, Suite 56-480
Atlanta, GA 30324
T: 252-560-5325

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the Northern District of Georgia, I hereby certify that this submission has been prepared in compliance with Local Rule 5.1(C), using 14-point Times New Roman Font.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison

R. CHRISTOPHER HARRISON

Georgia State Bar No. 333199

JACKSON A. GRINER

Georgia State Bar No. 495020

harrison@downeycleveland.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Andrew M. Beal, Esq.
Milinda Brown, Esq.
Buckley Beal, LLP
600 Peachtree Street, NE
Suite 3900
Atlanta, GA 30308

This 11th day of July, 2024.

DOWNEY & CLEVELAND, LLP

By: /s/ R. Christopher Harrison
R. CHRISTOPHER HARRISON
Georgia State Bar No. 333199
JACKSON A. GRINER
Georgia State Bar No. 495020
Attorneys for Defendant